

1 WILLIAM A. ISAACSON (*Pro hac vice*)  
(wisaacson@bsfllp.com)  
2 STACEY K. GRIGSBY (*Pro hac vice*)  
(sgrigsby@bsfllp.com)  
3 NICHOLAS WIDNELL (*Pro hac vice*)  
(nwidnell@bsfllp.com)  
4 BOIES SCHILLER FLEXNER LLP  
1401 New York Avenue, NW  
Washington, DC 20005  
5 Tel: (202) 237-2727; Fax: (202) 237-6131

6 RICHARD J. POCKER #3568  
(rpocker@bsfllp.com)  
7 BOIES SCHILLER FLEXNER LLP  
300 South Fourth Street, Suite 800  
8 Las Vegas, Nevada 89101  
9 Tel: (702) 382-7300; Fax: (702) 382-2755

10 DONALD J. CAMPBELL #1216  
(djcc@campbellandwilliams.com)  
11 J. COLBY WILLIAMS #5549  
(jcw@campbellandwilliams.com)  
12 CAMPBELL & WILLIAMS  
700 South 7th Street  
Las Vegas, Nevada 89101  
13 Tel: (702) 382-5222; Fax: (702) 382-0540

14 *Attorneys for Defendant Zuffa, LLC, d/b/a*  
15 *Ultimate Fighting Championship and UFC*

16  
17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,  
on behalf of themselves and all others similarly  
21 situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

25 Defendant.  
26

No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF NICHOLAS A.  
WIDNELL IN SUPPORT OF THE  
JOINT MOTION PROPOSING  
BRIEFING SCHEDULE ON EXHIBIT  
OBJECTIONS**

1 I, Nicholas A. Widnell, declare as follows:

2 1. I am a member in good standing of the bar of the District of Columbia. I am  
3 admitted *pro hac vice* to practice before this Court. I am a Partner in the law firm Boies Schiller  
4 Flexner LLP (“BSF”) and counsel for Zuffa, LLC (“Zuffa”) in the above captioned action in the U.S.  
5 District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No. 2:15-cv-01045-RFP-PAL.

6 2. I make this declaration in support of the Joint Motion Proposing Briefing Schedule on  
7 Exhibit Objections. Based on my personal experience, knowledge, and review of the files, records,  
8 and communications in this case, I have personal knowledge of the facts set forth in this Declaration  
9 and, if called to testify, could and would testify competently to those facts under oath.

10 3. On May 24, 2019, counsel for Zuffa and Plaintiffs exchanged exhibit lists of the  
11 documents they intend to use at the evidentiary hearings on class certification.

12 4. From May 24, 2019 through June 7, 2019, counsel for Zuffa and Plaintiffs met and  
13 conferred repeatedly regarding the documents on the Parties’ exhibit lists. During these meet and  
14 confers, the Parties agreed that certain exhibits that appeared on both of their lists would be joint  
15 exhibits, as listed in Exhibit A to this declaration.

16 5. Exhibit A to this declaration is a true and correct copy of the combined list of joint,  
17 Plaintiffs, and Zuffa exhibits. Per this Court’s Chamber Practices, Zuffa and Plaintiffs have indicated  
18 exhibits to which no party objects on grounds of authenticity with one star<sup>1</sup> and exhibits to which no  
19 party objects on any grounds with two stars.

20  
21 I declare under penalty of perjury under the laws of the United States of America that the  
22 foregoing facts are true and correct. Executed this 14th day of June, 2019 in Washington, DC.

23  
24 /s/ Nicholas A. Widnell  
25 Nicholas A. Widnell

26  
27 <sup>1</sup> I understand that Plaintiffs do not object to any of Zuffa’s proposed exhibits on grounds of  
28 authenticity, but reserve all rights to do so for purposes of admissibility at trial.